

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

United States of America  
*ex rel.* ALEX DOE, Relator,

The State of Texas  
*ex rel.* ALEX DOE, Relator,

The State of Louisiana  
*ex rel.* ALEX DOE, Relator,

Plaintiffs,

v.

Planned Parenthood Federation of America,  
Inc., Planned Parenthood Gulf Coast, Inc.,  
Planned Parenthood of Greater Texas, Inc.,  
Planned Parenthood South Texas, Inc.,  
Planned Parenthood Cameron County, Inc.,  
Planned Parenthood San Antonio, Inc.,

Defendants.

CIVIL ACTION NO. 2:21-CV-00022-Z

**AFFILIATE DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE  
DOCUMENT OUT OF TIME**

Defendants Planned Parenthood Gulf Coast, Inc. (“PPGC”), Planned Parenthood of Greater Texas, Inc. (“PPGT”), Planned Parenthood South Texas, Inc. (“PPST”), Planned Parenthood Cameron County, Inc. (“PP Cameron County”), Planned Parenthood San Antonio, Inc. (“PP San Antonio”) (collectively, “Affiliate Defendants”) respectfully ask the Court to grant leave to file out of time their Brief in Support of the Motion for Protective Order and the Appendix and Sealed Appendix containing the exhibits for the brief. (ECF 253, 254, 255).

On October 19, 2022, Relator sent an email to Affiliate Defendants with blanket objections to certain categories of Affiliate Defendant’s confidentiality designations. Affiliate

Defendants met and conferred with Relator on October 24, 2022 to discuss the objections. During this meet and confer, Affiliate Defendants informed Relator they were revising their confidentiality designations to conform to this Court's October 11 Order that sought to clarify the Protective Order (ECF 214) and requested Relator hold their objections in abeyance until Affiliate Defendants could produce the revised designations. Relator declined to do so. Because Affiliate Defendants and Relator were unable to reach an agreement through the meet and confer process, under the Protective Order, Affiliate Defendants were required to file a motion to for protective order November 2, 2022, 14 days after Relator's written objection. ECF 133 at ¶ 7.

Counsel for Affiliate Defendants worked diligently to ensure that they could file a timely motion for protective order by the 14 day deadline. The motion was electrically filed on November 2, 2022 at 11:57 pm CT. However, due to counsels' firmwide system update and a minor technical problem when converting the brief to PDF, Affiliate Defendants were unable to get the supporting brief, public exhibits, and sealed exhibits electronically filed until November 3, 2022 at 12:08 am, 12:10 am, and 12:12 am CT, respectively.

Affiliate Defendants apologize for this error and file this motion to formally request that the Court grant leave to permit the untimely filing of their supportive material. To prevent any inconvenience that the delay in receiving supporting materials may have caused the Relator, Affiliate Defendants also request that this Court grant Relator an additional day to file their response to Affiliate Defendants' Motion for Protective Order.

Dated: November 3, 2022

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 3, 2022, the foregoing document was electronically filed with the Clerk of Court using CM/ECF.

/s/ Tirzah S. Lollar

Tirzah S. Lollar